

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA,

v. Case No.: 3:24CR-041-DJN1

MUHAMMAD PAHLAWAN,

and. Case No: :24CR-041-DJN2

MOHAMMAD MAZHAR,

and Case No. 3:24CR-041DJN3

GHUFRAN ULLAH,

and Case No.:3:24CR-041-DJN4

IZHAR MUHAMMAD, Defendants.

MOTION FOR TEMPORARY INJUNCTION

Comes now your defendant, Izhar Mohammad, by counsel, and moves for an Order enjoining the United States, on a temporary basis from conducting forensic analysis, based on the following:

1. The United States has advised that it intends to exploit information from a cellular phone seized from the defendant on January 11, 2024.
2. The United States has further advised that the exploitation process intended to be utilized may create a “non zero” risk of destruction of the device, or the internal components therein.
3. Defense counsel has filed, ex parte, a Motion for the Appointment of an Expert based on the reasons stated therein.

4. Until a determination can be made on whether there are suitable alternatives, or measures which can be implemented to preserve the integrity of any component in the phone, the United States should be enjoined from conducting any procedure or process, regardless of the existence of a search warrant, until defense counsel's expert can properly assess the potential damage to the device.

WHEREFORE, the defendant would move for a temporary injunction requiring the government to refrain from any intrusive forensic analysis into the defendant's cellular telephone pending further court order.

Respectfully Submitted,

By: _____ /s/ _____

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CERTIFICATE

I hereby certify that this 11th day of April, 2024, I will electronically file the foregoing the Clerk of the Court using the CM/ECT system which will then send a notification of such filing (NFE) to all associated attorneys.

By: _____ /s/
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